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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the Federal Communications Commission Washington, D.C 200554

In the matter of	•
Replacement of the Part 90 by part 88 to revise the Private Land Mobile Radio Services and Modify the Policies Governing them.	PR Docket 92-235

To; The Commission

Comment of

The Watchung Volunteer Fire Department submits its comments to the commission's Notice of Proposed Rulemaking in this proceeding.

1) The Watchung Volunteer Fire Department currents operates a UHF Repeater System on a 25 khz Fire Service assignment. The construction of this system been completed over a period of three years do funding constraints.

The proposed changes and the timetables proposed for essentially two complete system changes are extremely burdensome for a Volunteer Fire Department with minimal funding. We have not completed paying for our current system.

Additionally, I am not aware of any equipment to retrofit an existing receiver to have a narrower bandwith. Our receivers would still have a 25KHZ window, and we have had several problems with current 12.5 splinter offsets, with interference problems caused by a signals some 40 miles away.

Further I have significant concern about proposed narrowband, low deviation signals ability to withstand the type of hostile terrain features in our area, unless they were processed digitally, and this would be cost prohibitive.

2) It would appear that the proposed plan is a way to

3) I understand that the current Fire Service frequency assignments could be lumped together with Local Government Highway, Police, School Buses and such. This will clearly hurt the fire service as we have little spectrum that we have priority to as it is. Each emergency service should have some priority to spectrum. Shared Frequency Assignments are currently impossible to get. Do I understand that it is proposed to provide exclusive thannels for large users? This is unfair as the